RE: Harbor Pathogen TMDL
Miller, Robin
to:
Rosella OConnor
01/27/2012 10:57 AM
Hide Details
From: "Miller, Robin" <Robin.Miller@hdrinc.com>

To: Rosella OConnor/R2/USEPA/US@EPA

History: This message has been replied to.

1 Attachment

plotEntero.pdf

Rosella:

Can I call you at 2PM? Please confirm if that is ok. Maybe see if Felix can join us too if he is available. I'd like to talk about the response to NJDEP and a few questions that I have. We can also talk about the attached pdf. It helps better frame some of the issues. I would probably talk about the pdf in the page order 1, 2, 7, 8, 3, 4, 5, 6.

Thanks,
Robin

ROBIN LANDECK MILLER

HDR|HydroQual
Professional Associate | Senior Water Quality Project Director

1200 MacArthur Boulevard | Mahwah, NJ 07430
201.529.5151 | f: 201.529.5728
robin.miller@hdrinc.com | hdrinc.com
HydroQual is now HDR|HydroQual

From: Rosella OConnor [mailto:OConnor.Rosella@epamail.epa.gov]
Sent: Friday, January 27, 2012 10:43 AM
To: Miller, Robin
Subject: Harbor Pathogen TMDL

Hi Robin,

Below are some excerpts from Babara's e-mails to Felix . The first one is the latest. I want to be sure that we understand, from a technical perspective, what needs to be done so we can move forward. There have been a lot of exchanges between Felix and Barbara, some of which have been confusing.
On Monday, Jeff will be talking to Jill Lipoti regarding the issues below.

Jeff would like to know exactly what steps are needed to complete the TMDL, what decisions need to be made, what info is needed from NJDEP, and any recommendations you have on how to proceed.

I'm in the office today until 4:00 if you would like to discuss further..
Thanks,
Rosella

We all agree there is a need for real time dialogue on this matter and I will have Ursula search for times that work for folks here and she will reach out to you. From your email, it seems there is some lack of clarity on the issues and needs such as:

Boundary inputs: recall that it was as a result of asking how HydroQual calculated 35 geomean inputs from the boundaries so we could do the same with Stevens work that we discovered that HydroQual's description of the boundary assumption of "meets standards" really meant "35 all the time" which is not the standard, it is more stringent than the standard. This is what initiated the concern that the modeled results for the harbor could not be relied upon as they were because they assumed a more stringent threshold from upstream boundaries than would occur if water quality that met standards was the boundary input. The affect in the modeled area would be to start with a quality better than should be expected. The model would then call for less stringent reductions in the modeled area needed to meet standards where they are not met (per model run to date, Passaic and Hackensack) and could alter the finding that standards are met in other waters. As NJ and EPA are engaged in a dialogue and strategy development intended to result in final LTCP permits for all CSO waters, and the actions for the remaining harbor waters depends on the finding from the water quality model that the standards are met without further action based on the model, it is not appropriate to limit the view to the Passaic and Hackensack. We need to have a consistent and defensible approach for the findings for the whole harbor. Therefore, essential to moving forward is that we need to settle on defensible and consistent boundary assumptions for the whole harbor to move this forward. Stevens can give us geomean inputs at Dundee via the model they are developing, when it is complete, but we can also consider a consistent approach for

the harbor based on a different method, if we can agree on one (Robin's method is certainly on the table for discussion).

Assistance from HydroQual: I am not sure what you are asking here; we have provided our needs already and discussed it as well. Are you talking about re: the geomean and what else the tmdl model run should encompass? If so, I think we will come to that as an outcome of the conference call we are scheduling.

From: "Barbara Hirst" <Barbara.Hirst@dep.state.nj.us>
To: "Helen Pang" <Helen.Pang@dep.state.nj.us>, Felix Locicero/R2/USEPA/US@EPA
Cc: Rosella OConnor/R2/USEPA/US@EPA, Antony Tseng/R2/USEPA/US@EPA
Date: 01/24/2012 04:54 PM
Subject: Re: I want to send this email to NJDEP

As to how to defensibly generate geomean boundary loadings, the suggestion
put forth by Robin is being evaluated here, so it would be premature to proceed until we agree that is a the best/most defensible way to calculate
that loading. Once we agree as to the best way to do this, we will want
to do the same method to generate loadings from the Stevens model to the
harbor model. It is also possible we could move forward with HydroQual applying a consistent methodology at all boundaries, but that too has not
been decided here. Of course this begs the question: shouldn't this be done at all harbor boundaries, else how can we be sure we meet standards
in the other waters. Another point: the worst grid in Passaic at 87% is
at 23, more stringent by a lot than the standard, so we will need to determine the real level of reduction needed, which may be less than 87%
when all input and tmdl condition assumptions have been agreed to. Not sure how many runs it will take to determine this. Bottom line, I can't
recommend that the proposed boundary calc and associated runs proceed as
described given the premise you set that money is extremely limited. We

need to get concurrence on the input and design condition assumptions and
then we can craft the runs needed to get the tmdl result. As soon as I have received direction from management on these matters, we will know how
to proceed and can talk about timeframe. I think we will need a meeting
of the tech and policy minds on these issues.